



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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August 27, 2002

VIA EMAIL AND U.S. MAIL

Bruce P. Beausejour, Esq.
Victor D. Del Vecchio, Esq.
Verizon Massachusetts
185 Franklin Street, Room 1403
Boston, MA 02110

Re: D.T.E. 01-31-Phase II (Track B)
D.T.E.'s First Set of Information Requests

Dear Messrs. Beausejour and Del Vecchio:

Enclosed please find the first set of questions to Verizon Massachusetts issued by the Department in the above-captioned matter. Please submit Verizon's responses to the Department and the parties in hard copy and by email on or before 5:00 p.m., Friday, September 6, 2002. Should you have any questions, please contact me at (617) 305-3608.

Sincerely,

Paula Foley
Hearing Officer

Encs.

cc: DTE 01-31-Phase II service list (w/encs.)

INSTRUCTIONS FOR RESPONSES TO INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Verizon Massachusetts the following Information Requests.

Instructions

The following instructions apply to the Information Requests issued to all parties in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the petitioner or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in the broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, and on all Department staff and parties; and submit two (2) copies of the responses to Paula Foley, Hearing Officer.

QUESTIONS TO VERIZON MASSACHUSETTS

D.T.E. 01-31-Phase II (Track B)

August 27, 2002

Questions based upon Verizon's June 5, 2002, D.T.E. 01-31-Phase I Compliance Filing, Tab A, Att. A:

1. For each Residence Basic Service offering listed, please identify each and every Unbundled Network Element ("UNE") that is used to provide each service.
2. For each Residence Basic Service that is offered on an unlimited usage basis or that includes an unlimited usage component, please fully explain the methodology Verizon employs to determine the usage in order to price the measured rate elements of that service. Please provide the studies or worksheets relied upon to develop this usage.

Questions based upon Verizon's June 5, 2002, D.T.E. 01-31-Phase I Compliance Filing, Tab A, ¶ T:

3. Please identify and explain each of the twelve service measurements contained in Verizon's current Quality of Service Reports.
4. When were the "standard" and "target" threshold level of service standards first established for each of the twelve service measurements contained in Verizon's current monthly Quality of Service Reports?
5. Please identify the study period used, and explain the type of historical data relied upon, to initially establish Verizon's "standard" and "target" threshold level of service measurements contained in Verizon's current monthly Quality of Service Reports.
6. Please explain whether there have been any changes to the "standard" and "target" threshold measurements since initially established. If so, please explain what the changes were, why and when the changes were made, and provide the data relied upon to make the changes.
7. Please provide a chart which provides a comparison of Verizon's actual performance results with the "standard" and "target" threshold levels for the twelve quality of service measurements for the most recently available 18 month time period, on both a SBU and statewide level, disaggregated by month, as reported in Verizon's monthly Quality of Service Reports.
8. Please indicate whether Verizon is required to file Quality of Service Reports in any other jurisdiction in which Verizon is regulated under an alternative form of regulation. If yes, please provide a copy of the most recently available Quality of Service Report

for each jurisdiction, and a copy of the portion of the applicable regulatory agency's decision requiring Verizon to file such a report with the agency.

9. Please provide the rationale for Verizon's selection of one twelfth of one percent of annual retail revenue as the appropriate penalty for every month that either the overall performance level is less than the existing threshold level, or if three or more of the 12 individual service items that comprise the service quality index fall below the standard threshold on a statewide basis in a given month.